

Exhibit “A”



**Service of Process
Transmittal**

03/28/2022

CT Log Number 541304792

TO: Risk Management Group
SAFEWAY INC.
5918 Stoneridge Mall Rd
Pleasanton, CA 94588-3229

RE: Process Served in Nevada

FOR: THE VONS COMPANIES, INC. (Domestic State: MI)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Re: PATRICIA VIOLET BARBER, individually // To: THE VONS COMPANIES, INC.

DOCUMENT(S) SERVED: --

COURT/AGENCY: None Specified
Case # A22850127C

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: C T Corporation System, Carson City, NV

DATE AND HOUR OF SERVICE: By Process Server on 03/28/2022 at 10:48

JURISDICTION SERVED : Nevada

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 03/29/2022, Expected Purge Date: 04/03/2022

Image SOP

Email Notification, Risk Management Group RM.Claim.Support@Safeway.com

Email Notification, Michael McCue Michael.McCue@safeway.com

Email Notification, Donna Shavers donna.shavers@albertsons.com

Email Notification, Carmen Rowland Carmen.Rowland@safeway.com

REGISTERED AGENT ADDRESS: C T Corporation System
701 S. Carson Street
Suite 200
Carson City, NV 89701
866-203-1500
DealTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other



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advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

Electronically Issued
3/23/2022 1:40 PM

SUMM
Justin G. Randall, Esq.
Nevada Bar No. 12476
ER INJURY ATTORNEYS
4795 South Durango Drive
Las Vegas, Nevada 89147
Telephone: (702) 968-7500
Facsimile: (702) 968-7525
Attorneys for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

PATRICIA VIOLET BARBER, individually:)	A-22-850127-C
)	
Plaintiffs,)	CASE NO.
)	DEPT. NO.
vs.)	
)	
THE VONS COMPANIES, INC., individually:)	<u>SUMMONS</u>
DOES I - X, and ROE CORPORATIONS I - X,)	
inclusive,)	
)	
Defendants.)	

NOTICE! YOU HAVE BEEN SUED, THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS, READ THE INFORMATION BELOW.

THE VONS COMPANIES, INC.

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against you for the relief set forth in the Complaint.

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:
 - a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.
 - b. Serve a copy of your response upon the attorney whose name and address is shown below.
2. Unless you respond, your default will be entered upon application of the Plaintiff(s) and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.
3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.
4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators, each have 45 days after service of this summons within which to file an answer or other responsive pleading to the complaint.

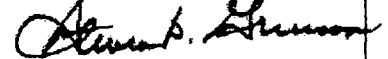
Issued at the direction of:

Justin G. Randall, Esq.
Nevada Bar No. 12476
4795 South Durango Drive
Las Vegas, Nevada 89147
Attorneys for Plaintiff

CLERK OF THE COURT

Josefina San Juan 3/24/2022
DEPUTY CLERK DATE
200 Lewis Avenue, 5th Floor
Las Vegas, Nevada 89155-1601

Electronically Filed
3/23/2022 1:40 PM
Steven D. Grierson
CLERK OF THE COURT



COMP

Justin G. Randall, Esq.
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Attorneys for Plaintiff

CASE NO: A-22-850127-C
Department 31

DISTRICT COURT

CLARK COUNTY, NEVADA

PATRICIA VIOLET BARBER, individually;)	
)	CASE NO.
Plaintiffs,)	DEPT. NO.
vs.)	
)	
THE VONS COMPANIES, INC., individually;)	<u>COMPLAINT</u>
DOES I - X, and ROE CORPORATIONS I - X,)	
inclusive,)	
)	
Defendants.)	

Plaintiff complains as follows:

GENERAL ALLEGATIONS

1. The actions complained of herein occurred in Clark County, Nevada.
2. Defendant THE VONS COMPANIES, INC. is, and at all times mentioned herein, was, a corporation conducting business in Clark County, Nevada.
3. This Court has jurisdiction over this matter under NRS 14.065 and NRS 4.370(1) because the facts alleged occurred in Clark County, Nevada and involve an amount in controversy in excess of \$15,000.00.
4. The true names and capacities of the Defendants designated herein as Doe or Roe Corporations are presently unknown to Plaintiff at this time, who therefore sues said Defendants by such fictitious names. When the true names and capacities of these defendants are ascertained, Plaintiff will amend this Complaint accordingly.
5. At all times pertinent herein, Defendants were agents, servants, employees or joint venturers of every other Defendant, and at all times mentioned herein were acting within the scope and course of said agency, employment, or joint venture, with knowledge and permission and consent of all other named

1 Defendants.

2 6. On January 28, 2022, Plaintiff was an invitee of Defendants located at 6450 Sky Pointe Dr.,
3 Las Vegas, Nevada (hereafter the "Property").

4 7. Defendants maintained and were in control of the Property.

5 8. While visiting the Property, Plaintiff slipped and fell on grease on the floor inside the
6 Property (hereafter the "dangerous condition"), causing Plaintiff serious injuries.

7 9. Defendants should have warned or otherwise made safe the dangerous condition because
8 that condition was non-obvious to Plaintiff.

9 10. Defendants negligently, carelessly, and recklessly maintained, constructed and allowed the
10 dangerous condition to exist.

11 **FIRST CAUSE OF ACTION**

12 11. Plaintiff incorporates paragraphs 1 through 10 of the Complaint as if those paragraphs were
13 fully incorporated herein.

14 12. Defendants owed Plaintiff a duty of care to warn Plaintiff of the non-obvious and dangerous
15 condition.

16 13. Defendants breached this duty of care by failing to warn Plaintiff of the dangerous, non-
17 obvious condition.

18 14. Defendants' negligence directly and proximately caused Plaintiff serious injury.

19 15. As a direct and proximate result of Defendants' negligence, Plaintiff received medical and
20 other treatments for injuries sustained to her bodily limbs, organs and nervous systems, all or some of
21 which conditions may be permanent and disabling and, all to Plaintiff's damage in a sum in excess of
22 \$15,000.00. Said services, care, and treatment are continuing and shall continue in the future.

23 16. As a direct and proximate result of Defendants' negligence, Plaintiff has been required to
24 and has limited certain recreational activities, which have caused, and shall continue to cause loss of
25 enjoyment of life.

26 17. Plaintiff has been required to engage the services of an attorney, incurring attorney's fees
27 and costs to bring this action.

28 \\\

1 WHEREFORE, Plaintiff expressly reserving the right to amend this complaint prior to or at the time
2 of trial of this action, to insert those items of damage not yet fully ascertainable, prays judgment against all
3 Defendants, and each of them, as follows:

- 4 1. For general damages in an amount in excess of \$15,000.00;
- 5 2. For special damages in an amount in excess of \$15,000.00;
- 6 3. For reasonable attorney's fees and costs;
- 7 4. For interest at the statutory rate; and
- 8 5. For such other relief as the Court deems just and proper.

9 ER INJURY ATTORNEYS

10
11 By: _____

12 Justin G. Randall, Esq.
13 Nevada Bar No. 12476
14 4795 South Durango Drive
15 Las Vegas, Nevada 89147
16 Attorneys for Plaintiff
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